

**REMARKS**

This paper is responsive to the Final Office Action mailed November 13, 2008. Claims 1-23, 25 and 26 are currently pending. Claims 1-23, 25 and 26 stand rejected. Claims 1, 15, and 20 have been amended. Support for all amended claims can be found in the specification, and no new matter has been added by these amendments. Reconsideration of the claims in view of the amendments and the following remarks is respectfully requested.

**Claims Rejection Under 35 U.S.C. § 103**

Claims 1-23 and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2007/0005762 to *Knox* in view of U.S. Patent No. 5,878,230 issued to *Weber* and U.S. Patent Publication No. 2005/0012965 to *Bloomfield*. Claim 26 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Knox*, *Weber* and *Bloomfield* in view of U.S. Patent Publication No. 2004/0006598 to *Bargagli Damm*.

The Office Action states that it is not the case that independent claim 1 requires “sending an initial e-mail message,” “receiving a first reply e-mail message,” and “sending a modified version of said first reply e-mail message” to be performed by the same device (i.e., internal mail facility). (Office Action dated November 13, 2008, page 2). First, Applicants respectfully submit that the argument from page 10, first paragraph to page 11, second full paragraph of the Response dated August 7, 2008 was that these steps were performed by the same device, i.e., web-based business information system, not an internal mail facility. Second, although Applicants respectfully disagree with the Office Action on this point, since pending claim 1, for example, explicitly requires all of these steps to be performed “In a web-based business information system” (emphasis added), Applicants have, for the sole purpose of expediting examination of the subject application, amended each of the pending independent claims to explicitly require each of the aforementioned steps to be performed by the claimed internal mail facility.

Accordingly, Applicants’ respectfully submit that the relied upon references, *Knox*, *Weber*, and *Bloomfield*, fail to teach or suggest “sending an initial e-mail message,” “receiving a first reply e-mail message,” and “sending a modified version of said first reply e-

mail message" being performed by the same device for the aforementioned reasons as well as for the reasons discussed from page 10, first paragraph to page 11, second full paragraph of the Response dated August 7, 2008.

Moreover, with respect to amended claim 1, Applicants respectfully submit that the relied upon references, either alone or in combination, fail to teach or suggest at least two additional aspects: (1) "a first modified version of said tracking string"; and (2) "sending an initial e-mail message from said internal e-mail facility ... wherein a local part of said REPLY-TO field of said initial e-mail message comprises a tracking string ...; receiving at said internal e-mail facility a first reply message ... having a TO field including said tracking string; and sending from said internal e-mail facility a modified version of said first reply e-mail message ... wherein a local part of said REPLY-TO field [of said modified version of said first reply e-mail message] comprises a first modified version of said tracking string."

With respect to the first aspect, amended claim 1 requires a modified version of the tracking string. None of the relied upon references disclose modifications of tracking strings. For example, according to Applicants' best understanding, the transaction code in the "REPLY TO" field 290 of *Bloomfield* is not modified, nor is the tracking code sent from the mail enhancement server 12 of *Knox*.

With respect to the second aspect, amended claim 1 requires the same device to send a tracking string to an external contact, receive the tracking string from the external contact, and send a modified version of the tracking string to a native e-mail address of the end user. None of the relied upon references disclose this combination of features. For example, although *Bloomfield* discloses, *inter alia*, a transaction code being sent from a fax server 110 to an e-mail server 112, according to Applicants' best understanding, the e-mail server 112 does not modify the transaction code or send a modified transaction code to a device other than the fax server 110. Although *Knox* discloses a mail server 24 receiving a tracking code from a mail server 12 and forwarding the tracking code to a mail client 26, notably, a modified tracking code is not forwarded to the mail client 26. Indeed, according to Applicants' best understanding, if the mail server 24 were to forward a modified tracking code to the mail client 26, *Knox*'s device would fail to operate as intended since the logging server 14, which stores the identity of the email

recipient and associated tracking code (*Knox*; paragraph [0026]), would no longer be able to identify the email recipient as the logging server 14 would receive, from the mail client 26, a modified tracking code rather than the stored associated tracking code.

Accordingly, Applicants respectfully submit that neither *Knox*, *Weber*, or *Bloomfield*, alone or in combination with one another, disclose all of the features recited in independent claim 1. Specifically, *Knox*, *Weber*, and *Bloomfield* do not disclose (1) “a first modified version of said tracking string”; and (2) “sending an initial e-mail message from said internal e-mail facility ... wherein a local part of said REPLY-TO field of said initial e-mail message comprises a tracking string ...; receiving at said internal e-mail facility a first reply message ... having a TO field including said tracking string; and sending from said internal e-mail facility a modified version of said first reply e-mail message ... wherein a local part of said REPLY-TO field [of said modified version of said first reply e-mail message] comprises a first modified version of said tracking string.” For at least these reasons, claim 1 is allowable over the relied upon references.

Independent claims 15 and 20 recite features that are similar to the features recited in amended claim 1. As discussed above with reference to claim 1, the relied upon references do not teach or suggest these features. Thus, claims 15 and 20 are also allowable over the relied upon references for at least the same reasons as claim 1, as well as on their own merits.

Claims 2-14 are dependent on claim 1, claims 16-19 are dependent on claim 15, and claims 21-23, 25, and 26 are dependent on claim 20. As discussed above, claims 1, 15, and 20 are allowable over the cited art. Thus, claims 2-14, 16-19, 21-23, 25, and 26 are also patentable for the reasons discussed above with respect to claims 1, 15, and 20, as well as on their own merits.

In view of the foregoing, withdrawal of the rejection of claims 1-23, 25, and 26 under 35 U.S.C. § 103(a) is respectfully requested.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 206-467-9600.

Respectfully submitted,

/John J. Farrell/

John J. Farrell  
Reg. No. 57,291

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 206-467-9600  
Fax: 415-576-0300  
JJF:edj  
61748097 v1